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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

In the matter of Allocation of )

Spectrum Below 5 GHz )

Transferred from Federal )

Government Use )

ET Docket No. 94-32

REPLY COMMENTS OF HEWLETT-PACKARD COMPANY

Hewlett-Packard Company submits reply comments in response to the above captioned Notice Of Inquiry.

Respectfully Submitted by:

Robert Lanning

Date August 9, 1994

The FCC's Notice of Inquiry (NOI) (ET Docket No. 94-32) addresses allocation of spectrum below 5 GHz to be transferred from Federal Government use. In this NOI, the commission references a Petition for Rule Making that was filed in December of 1993 by the Coalition of Private Users of Emerging Multimedia Technologies (C.O.P.E.). Hewlett-Packard Company submits reply comments in this proceeding:

Hewlett-Packard Company is a large user of radio communications at various locations across the United States. (San Francisco Bay Area, CA; Roseville, CA; Corvallis, OR; Vancouver, WA; Boise, ID) We utilize radio communications for systems that operate in the 800 & 900 MHz, UHF & VHF bands. Radio Communications are utilized by our security departments, facility management operations, health and safety management operations, to name a few.

Hewlett-Packard Company understands the immediate need for additional spectrum to be allocate to the private land mobile industry as we have encountered the lack of available channels in several of the metropolitan areas in which we operate.

It appears that the 50 MHz of spectrum being addressed in this NOI could satisfy localized area communications systems providing communications service over short ranges. The spectrum that the Commission recommends from the NTIA reallocation report will not accommodate wide area land mobile uses due to the following:

The 2390-2400 MHz band is in close proximity to industrial, scientific and medical (ISM) devise operations. Interference from these adjacent operations could make this spectrum unusable for wide area communications.

The 2402-2417 MHz band is heavily used by consumer microwave ovens and other ISM devices, resulting in interference to other users in this band resulting in poor quality communications.

The 4660-4685 MHz band is not acceptable for cost effective-wide area coverage.

Hewlett-Packard Company does however request that the Communication allocate 75 MHz of spectrum as requested by the Coalition of Private Users of Emerging Multimedia Technologies (herein after referred to as C.O.P.E.) for use by the private land mobile community for emerging multimedia technologies.

Advanced technology applications such as the automatic transmission of messages advising of impending shortage of parts in a manufacturing environment, vehicle and personal tracking systems, remote safety and security inspection and automation of process and quality control functions are future applications that Hewlett-Packard Company could employ if sufficient spectrum is available to perform these functions.

The FCC has recently allocated 160 MHz of spectrum to public emerging technologies for PCS systems. We have concerns related to carrier provided communications systems.

Hewlett-Packard can not rely on systems that may not cover service area, to say nothing about necessary feature offerings that again may or may not be available depending on the carrier's general subscriber bases needs. Coverage and features must be tailored to the specific needs of the end users of the systems and the only way to meet this need is through an entity owning and controlling their own internal system. Provisions for private radio needs have not been addressed in the emerging technology allocations thus far.

In conclusion, a spectrum allocation for Advance Private Land Mobile Communication Services is necessary and would greatly enhance the development of emerging multimedia technologies that will be utilized by the industrial radio community.

We feel that the C.O.P.E. petition for Rule Making accurately outlines the overall need for this spectrum and the advantages to the Private Radio Community. We urge the FCC/NTIA to allocate usable spectrum to accommodate Advanced Private Land Mobile Communication Services. We also support the Motorola comments filed in this proceeding supporting an allocation for private advanced emerging technologies.